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 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARY HANNIGAN, et al.,

Plaintiffs,

vs.

**CITY AND COUNTY OF SAN
 FRANCISCO, et al.,**

Defendants.

Case No. 3:23-cv-02096-LB

**STIPULATED REQUEST TO
 CONTINUE SETTLEMENT
 CONFERENCE; ORDER
 CONTINUING SETTLEMENT
 CONFERENCE**

1 Plaintiffs MARY HANNIGAN and ESTATE OF KURT VON BOEHRENS (“Plaintiffs”)
2 and Defendant CITY AND COUNTY OF SAN FRANCISCO (“City”), by and through their
3 undersigned counsel of record, respectfully stipulate and request that the Settlement Conference
4 currently set for November 5, 2025, before the Hon. United States Magistrate Judge Lisa J.
5 Cisneros, be continued to a to-be-determined, future date. In support of this stipulated request, the
6 parties set forth the following facts establishing good cause:

- 7 1. This case was referred to the Hon. U.S. Magistrate Judge Lisa J. Cisneros to conduct a
8 settlement conference. ECF No. 20.
- 9 2. A settlement conference is presently scheduled for November 5, 2025, at 10:00 AM.
10 ECF No. 59.
- 11 3. Frank LaFleur, counsel for the City Defendants, is currently in trial, which is not
12 expected to conclude until at least November 14, 2025. As such, he is not available for
13 the scheduled settlement conference.
- 14 4. Sanjay S. Schmidt, lead counsel for Plaintiffs, was presented with a unique and rare
15 opportunity to take a trip abroad with his family, from October 30, 2025, through and
16 including November 10, 2025. Mr. Schmidt decided to go on the trip.
- 17 5. The parties are actively engaged in discovery. However, there are still key documents
18 outstanding, and before the case will be ripe for a settlement conference, key
19 depositions need to be taken. Thus, additional time is also necessary to complete key
20 discovery, in order to properly evaluate the case and have a productive and meaningful
21 settlement conference.
- 22 6. The parties have met and conferred, and agree that the case is not yet ripe for a
23 settlement conference.
- 24 7. On May 30, 2025, the Scheduling Order was amended, pursuant to a stipulation of the
25 parties. ECF No. 62.
- 26 8. Under the new, operative scheduling order, there is no ADR completion date deadline.

27 This issue was discussed at the last CMC, and it was decided amongst counsel and the
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Court that ADR should be completed when the case is ripe for ADR, particularly since Ms. Hannigan will need to travel from out of state to attend the conference.

9. The parties are in the process of identifying and finalizing dates that align for the commencement of depositions, which will commence not long after the conclusion of Mr. LaFleur's jury trial.

10. The parties believe that a Mandatory Settlement Conference in 2026, date would be best.

11. Accordingly, in light of the foregoing circumstances, the parties respectfully request that the Court vacate the settlement conference presently set for November 5, 2025, and that the parties be permitted to submit a report on or before December 12, 2025, with the Court (via e-mail), reporting on their readiness for a settlement conference and proposing dates for a re-scheduled conference.

WHEREFORE, based on the above circumstances, the parties respectfully stipulate and request that the Court vacate the settlement conference presently set for November 5, 2025, and that, instead, the parties be permitted to submit a report on or before December 12, 2025, with the Court (via e-mail), reporting on their readiness for a settlement conference and proposing dates for a re-scheduled conference.

Respectfully Submitted,

Dated: October 28, 2025

LAW OFFICE OF SANJAY S. SCHMIDT

/s/ Sanjay S. Schmidt

By: SANJAY S. SCHMIDT
Attorneys for Plaintiffs,
MARY HANNIGAN and
ESTATE OF KURT VON BOEHRENS

Dated: October 28, 2025

DAVID CHIU
City Attorney
JENNIFER E. CHOI
Chief Trial Deputy
FRANK M. LA FLEUR
Deputy City Attorney

/s/ Frank La Fleur*

By: FRANK LA FLEUR

Attorneys for Defendant

CITY AND COUNTY OF SAN FRANCISCO

*Mr. La Fleur consented to the filing of this document via CM-ECF.

ORDER

The Court, having considered the parties' stipulated request to continue the settlement conference, and good cause appearing therefor, hereby GRANTS the stipulation. The Court vacates the settlement conference presently set for November 5, 2025, and orders instead that the parties submit a report on or before December 12, 2025, with the Court (via e-mail), reporting on their readiness for a settlement conference and proposing dates for a re-scheduled conference.

IT IS SO ORDERED.

Dated: October 29, 2025



HON. LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE